

**UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

UNITED STEEL, PAPER AND FORESTRY,	)	
RUBBER, MANUFACTURING, ENERGY,	)	
ALLIED INDUSTRIAL AND SERVICE	)	
WORKERS INTERNATIONAL UNION, AFL-	)	
CIO-CLC, AND ITS LOCAL 14300-12	)	
	)	
Petitioner	)	No. 18-1222
	)	
v.	)	
	)	
NATIONAL LABOR RELATIONS BOARD	)	
	)	
Respondent	)	
	)	
and	)	
	)	
DURA-LINE CORPORATION,	)	
A SUBSIDIARY OF MEXICHEM	)	
	)	
Intervenor	)	

**UNOPPOSED MOTION OF INTERVENOR DURA-LINE CORPORATION,  
A SUBSIDIARY OF MEXICHEM, FOR LEAVE OF COURT TO  
PARTICIPATE IN THE ORAL ARGUMENT SCHEDULED FOR  
MAY 8, 2019**

To the Honorable, the Judges of the United States  
Court of Appeals for the District of Columbia Circuit:

Intervenor Dura-Line Corporation, a subsidiary of Mexichem (“Dura-Line”), by its undersigned counsel, respectfully moves for leave of Court to

participate in the oral argument scheduled for May 8, 2019. In support of its motion, Dura-Line states as follows:

1. The oral argument for this case is scheduled for May 8, 2019 at 9:30 a.m. before judges Henderson, Millett and Senior Judge Sentelle.

2. On May 2, 2019, the Court issued its order Per Curium allotting the time for oral argument. The order allotted ten (10) minutes each to Petitioner and Respondent and provided that one counsel per side will argue.

3. Respondent, National Labor Relations Board (NLRB), has agreed to share its allotted ten (10) minutes for oral argument with Dura-Line as follows: seven (7) minutes for Respondent and three (3) minutes for Dura-Line.

4. Dura-Line, which prevailed in the proceeding before the NLRB, will be directly impacted by the decision of this Court

5. Dura-Line has communicated with counsels for the Petitioner and the Respondent and neither opposes Dura-Line's motion to participate in the oral argument as set forth above.

WHEREFORE, Intervenor Dura-Line respectfully requests this Court to grant its motion to participate in the oral argument scheduled for May 8, 2019 by permitting Dura-Line's counsel to share three (3) minutes of Respondent's allotted ten (10) minutes for oral argument and to permit two counsel for Respondent to argue.

Dated: May 3, 2019

Respectfully submitted,

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

By: /s/ Grant D. Petersen

Grant D. Petersen, Esq.  
Ogletree Deakins  
100 N. Tampa Street  
Suite 3600  
Tampa, FL 33602

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	)	
Intervenor.	)	
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**CERTIFICATE OF COMPLIANCE**

Pursuant to Federal Rule of Appellate Procedure 27(d)(2), Dura-Line Corporation certifies that its motion contains 248 words of proportionally-spaced, 14-point type, and the word processing system used was Microsoft Word 2016.

Dated: May 3, 2019

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

By: /s/ Grant D. Petersen

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 3, 2019, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit by using the CM/ECF system. I certify that the foregoing document was served on all parties or their counsel of record through the appellate CM/ECF system.

Dated: May 3, 2019

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

By: /s/ Grant D. Petersen

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